

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
NORTHERN DIVISION AT COVINGTON**

JANE DOE,

Plaintiff,

v.

DIRTY WORLD
ENTERTAINMENT
RECORDINGS LLC dba
THEDIRT.COM, HOOMAN
KARAMIAN aka NIK
RICHIE aka CORBIN
GRIMES, DIRTY WORLD,
LLC dba THEDIRTY.COM,
and DIRTY WORLD
ENTERTAINMENT, LLC
dba THEDIRTY.COM,

Defendants.

Case No. 2:09-cv-00219-WOB

Judge William O. Bertelsman

**MOTION FOR SUMMARY
JUDGMENT OF DIRTY
WORLD, LLC AND NICK
LAMAS-RICHIE**

Pursuant to Federal Rules of Civil Procedure 56, Defendants Dirty World, LLC and Nik Lamas-Richie (formerly known as Hooman Karamian), by counsel, hereby move this Court to grant them judgment as a matter of law as to Plaintiff's claims against them. As set forth more fully in the accompanying supporting Memorandum of Law, these Defendants are entitled to judgment because they are immune from liability for content created by third-parties pursuant to the Communications Decency Act, 47 U.S.C. § 230(c)(1) ("CDA"). Additionally, the content at issue created by Defendants as opposed to third-parties constitutes non-actionable expressions of opinion and are further not of and concerning Plaintiff and are non-defamatory as a matter of law.

Wherefore, for the foregoing reasons, these Defendants requests that this Court grant their Motion for Summary Judgment awarding them judgment as a matter of law.

**DIRTY WORLD, LLC AND
NIK LAMAS-RICHIE**

/s Alexander C. Ward
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**Counsel for Defendants,
Dirty World, LLC and
Nik Lamas-Richie**

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2011 I electronically filed the foregoing Motion for Summary Judgment with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s Alexander C. Ward
Counsel for Defendants,
Dirty World, LLC and
Nik Lamas-Richie